217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT
RENEWAL

PERMITTEE

Interstate Brands Corporation
Attn: Roger Schneider
1511 West Lincoln Avenue
Peoria, Illinois 61605-1860

Application No.: 75080034 I.D. No.: 143065AMF
Applicant's Designation: Date Received: July 9, 2001
Subject: Bakery
Date Issued: November 15, 2002 Expiration Date: November 15, 2007
Location: 1511 West Lincoln Avenue, Peoria

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of flour transferring sources, bake ovens 1 and 2, line filters, boilers 1 and 2, miscellaneous heating units, video jet printing equipment, oven chain lubrication, welding sources, and several storage tanks as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year from VOM). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program permit. The maximum emissions of this source, as limited by the conditions of the permit, are described in Attachment A.

b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permits for this location.

2a. i. Emissions of VOM from the ovens shall not exceed 11.0 tons per 4-wk period and 88.0 tons per year. This limit shall include emissions of VOM from all types of baked bread and buns in the ovens.

ii. VOM emissions shall be calculated for the ovens as follows for each type of bread and buns:

VOM emission factor (ef) in lb/ton of baked bread or buns:

$$ef = 0.95*Yi + 0.195*ti - 0.51*S - 0.86*ts + 1.90$$

VOM emissions (Evom) in tons:

$$Evom = ef * tb/2000$$

Where: Yi = initial baker's percent of yeast

ti = total yeast action time in hours

S = final (spike) baker's percent of yeast

ts = spiking time in hours

tb = tons of baked bread

iii. The amount of baked bread and buns shall be limited such that the VOM emissions from all types of bread and buns will not exceed the emission limits in Condition 2ai as determined by using the emissions calculations in Condition 2aii.

iv. Compliance with annual limits shall be determined from a running total of 13 continuous 4-wk periods.

b. VOM emissions of the following equipment shall not exceed the following limits:

Item of Equipment	VOM Emissions (Ton/Yr)
Storage Tanks	0.9
Oven Chain Lubrication	3.0
Video Ink Jet Printing	1.6
Fuel Combustion	0.6

These limits are based on maximum capacities of the storage tanks, 5.5 lb VOM/mmcf and 215 mmcft/yr natural gas usage, the maximum use of 735 gal/year of oven chain lubrication with a maximum VOM content of 8.0 lb/gal, and the maximum use of 176 lb/yr of ink and 3,037 lb/yr of make-up solution both used in video ink jet printing with a maximum VOM content of 100% weight %.

3a. All flour transfer shall be controlled by filters and the filters operating properly whenever flour is being transferred.

b. Inspections of the flour transfer equipment and flour control systems shall be performed as necessary but at least once per week when the facility is in operation to confirm compliance with the above requirements.

c. The Permittee shall maintain records of the inspections required in this condition in an operating and maintenance log. This log shall contain, at a minimum, identification of any filter leaks with visible emissions of particulate matter, any other source of the visible emissions, the actions taken to resolve the visible emissions, and the time of any filter replacement.

d. The line filters shall be operated to have a minimum control efficiency of particulate matter of 90%.

e. Emissions of particulate matter from the facility shall not exceed the following limits:

Item of Equipment	PM Emissions (Ton/Yr)
Flour Storage Transfer	1.0
Flour Use Bin Transfer	1.0
Flour Blender Transfer	1.0
Bake Ovens 1 and 2	4.9
Miscellaneous Line Filters	0.5
Miscellaneous Welding Sources	0.5
Fuel Combustion	0.9

These emissions are based on standard emission factor of 0.24 lb/ton for flour transfer controlled by filters with a minimum control efficiency of 90%, emissions from the ovens of 0.55 lb/hour and a throughput limit based on the flour usage plus addition ingredients, and negligible emissions based from maximum throughput from the line filters and welding source. Fuel combustion particulate matter emissions are based on standard emission factors of 7.6 lb/mmcf and 215 mmcf/year.

4. Emissions from natural gas combustion shall not exceed the following limits:

	E M I S S I O N S			
Usage	Nitrogen Oxides		Carbon Monoxide	
(mmscf/Yr)	(Lb/mmscf)	(Ton/Year)	(Lb/mmscf)	(Ton/Year)
215	100	10.8	84	9.0

These limits are based on maximum fuel usage and standard emission factors.

5. The Permittee shall maintain records of the following items:

a. VOM emissions from the ovens for each kind of baked bread or buns including supporting calculations (tons/4-wk period and tons/year)

b. VOM emissions from other equipment as listed in Condition 2(b), including supporting calculation receiving records (tons/year)

6. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA.

As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA and USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Unit in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.

9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

   Illinois Environmental Protection Agency
   Division of Air Pollution Control
   Compliance Section (#40)
   P.O. Box 19276
   Springfield, Illinois 62794-9276

   and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

   Illinois Environmental Protection Agency
   Division of Air Pollution Control
   5415 North University
   Peoria, Illinois 61614

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year, from the prior calendar year as best represented by the 13 4-wk periods of records for the calendar year:

    a. VOM emissions summary report from each oven for each 4-week period during the calendar year. Supporting calculations of VOM emissions from the ovens for each kind of baked bread and buns (tons/4-week period and tons/year) as required by Condition 4(a) shall be kept on site, and made available to the Illinois EPA upon request.

If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

Please note that this permit is revised to reflect a change at the parts cleaning station from solvent to aqueous.

If you have any questions on this, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JPB:jar

cc: Illinois EPA, FOS, Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the bakery operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, (i.e., 100 tons per year of volatile organic material) at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, and control measures are more effective than required in this permit.

1a. VOM emissions from the facility:

i. Emissions of VOM from the ovens shall not exceed 11.0 tons per 4-wk period and 88.0 tons per year as determined by the emission calculations specified in the permit.

ii. Emissions of VOM from storage tanks, parts cleaning stations, oven chain lubrication, and video ink jet printing:

Item of Equipment	VOM Emissions (Ton/Yr)
Storage Tanks	0.9
Oven Chain Lubrication	3.0
Video Ink Jet Printing	1.6
Fuel Combustion	0.6

These limits are based on maximum capacities of the storage tanks, 5.3 lb VOM/mmcf and 215 mmcft/yr natural gas usage, the maximum use of 735 gal/year of oven chain lubrication with a maximum VOM content of 8.0 lb/gal, and the maximum use of 176 lb/yr of ink and 3,037 lb/yr of make-up solution both used in video ink jet printing with a maximum VOM content of 100% weight %.

b. PM emissions from the facility:

Item of Equipment	PM Emissions (Ton/Yr)
Flour Storage Transfer	1.0
Flour Use Bin Transfer	1.0
Flour Blender Transfer	1.0
Bake Ovens 1 and 2	4.9
Miscellaneous Line Filters	0.5
Miscellaneous Welding Sources	0.5
Fuel Combustion	0.9

These emissions are based on standard emission factor of 0.24 lb/ton for flour transfer controlled by filters with a minimum control efficiency of 90%, emissions from the ovens of 0.55 lb/hour and a throughput limit based on the flour usage plus addition ingredients, and negligible emissions based from maximum throughput from the line filters and welding source. Fuel combustion particulate matter emissions are based on standard emission factors of 7.6 lb/mmcf and 215 mmcf/year.

c. NO_x emissions from the facility:

Item of Equipment	Usage (mmscf/Yr)	Emission Factor (Lb/mmscf)	NO_x Emissions (Ton/Yr)
Natural Gas Combustion	215	100	10.8

d. CO emissions from the facility:

Item of Equipment	Usage (mmscf/Yr)	Emission Factor (Lb/mmscf)	CO Emissions (Ton/Yr)
Natural Gas Combustion	215	84	9.0

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